

IN THE
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS

UNITED STATES OF AMERICA)
)
)
v.)) No. 4:23-mj-1417
)
ANDREW VENEGAS)
)

UNOPPOSED MOTION FOR CONTINUANCE

TO THE HONORABLE JUDGE KENNETH M. HOYT:

COMES NOW, Andrew Venegas, who respectfully requests this Honorable Court to enter an order continuing this cause and in support thereof would show as follows:

1. The United States Government is unopposed to this motion.
2. The case is currently scheduled October 2, 2023.
3. Defense is still awaiting discovery.
4. The United State Government is unopposed to this motion.
5. This motion is not made for delay.

WHEREFORE, PREMISES CONSIDERED, Defendant requests that this Honorable Court grant this motion and reset the sentencing for 90 days or whichever date this Honorable Court sees fit.

Respectfully submitted,

PAUL DOYLE & ASSOCIATES, P.C.

By: /s/ Paul Doyle
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ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 29th day of September 2023, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which sent notification of such filing to all counsel of record.

/s/ Paul Doyle _____
Paul Doyle
Attorney for Andrew Venegas

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that on the 28th day of September 2023, Luis Batarse, Assistant United States Attorney, stating he was unopposed to this motion.

/s/ Trevor Sharon _____
Trevor Sharon
Attorney for Andrew Venegas